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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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September 3, 1993

Mr. Keith Welch
Utah Fuel Company
P. O. Box 719
Helper, Utah 84526

Re: Water Monitoring Reports, Utah Fuel Company, Skyline Mine, ACT/007/005,
Folder #2, Carbon County, Utah

Dear Mr. Welch:

During our recent phone conversation, I informed you that SUFCo had not been reporting all of the required water quality parameters. The current Mining and Reclamation Plan requires that the pH and specific conductance be measured both in the field and laboratory for all samples taken in the older permit area. Currently SUFCo is reporting only one reading per sample for pH and specific conductance. The reports do not indicate where the readings were taken.

You stated that the data in the water monitoring reports were from field measurements and that the laboratory values had been taken, but not reported. You then agreed to send me copies of the lab sheets that showed the laboratory measurements for the pH and specific conductance.

In order to comply with the terms of the currently approved Mining and Reclamation Plan SUFCo must submit both field and laboratory measurements for pH and specifics for all water samples taken in the older permit area. Past water monitoring reports should be updated to include the missing data.

Under the current plan nitrate ($\text{NO}_3 + \text{NO}_2$) is listed as a parameter for the older permit area. Currently SUFCo is reporting only nitrate ($\text{NO}_3 - \text{N}$), nitrogen in the NO_3 . You stated you felt there was no reason why NO_2 should be included in the water quality reports. Division data indicates that testing for NO_2 was specifically included in SUFCo's water monitoring plan. NO_2 from longwall oils once used at the Skyline mine may possibly have been a factor in an algae bloom at Eccles Creek. Since SUFCo previously used the same type of longwall oil there



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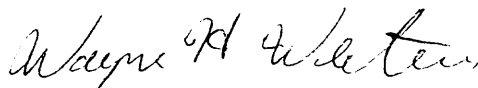
is concern that an algae bloom could occur near SUFCo.

SUFCo's water monitoring reports must be consistent with the approved Mining and Reclamation Plan. Either NO₂ will be included in the reports or the Mining and Reclamation Plan must be modified and that parameter dropped.

Enclosed is the Notice of Violation for failure to conduct ground-water monitoring according to the approved plan under R645-301-731.200.

Please let me know if I can be of any further assistance in these matters.

Sincerely

A handwritten signature in cursive script, appearing to read "Wayne H. Western".

Wayne H. Western
Reclamation Engineer

Enclosure
cc: D. Haddock
SUFCOH20.WHW